

**FILED**

MAY - 5 2014

DONNA HART  
CLERK

IN THE CIRCUIT COURT OF MISSISSIPPI COUNTY, ARKANSAS

**KEESHA STRINGER**

**PLAINTIFF**

vs.

Case No. CV-2014-70  
(JF)

**SMITH TRANSPORTATION  
INCORPORATED and JOHNIE STEIN**

**DEFENDANTS**

**COMPLAINT**

COMES the Plaintiff, Keesha Stringer, by and through counsel, The Brad Hendricks Law Firm, and for her Complaint against Defendants, Smith Transportation Incorporated and Johnie Stein, states:

1. Plaintiff Keesha Stringer is an individual resident of Mississippi County, Arkansas.
2. Defendant Johnie Stein is an individual resident of Rosendale, Missouri.
3. Defendant Smith Transportation Incorporated is a for-profit Kansas corporation doing business in the State of Arkansas, with registered agent of service being Greg Smith, 13421 W. 78<sup>th</sup> St., Lenexa, Kansas 66216.
4. The subject matter of this action concerns tortuous injury occurring in Mississippi County, Arkansas.
5. This honorable court has personal and subject matter jurisdiction over this matter and is the proper venue for this action.

6. On December 6, 2013, Keesha Stringer was a passenger in a 1991 Camaro vehicle operated by Antonio Patterson, and traveling northbound on Interstate 55 in Burdette, Arkansas, when Patterson lost control of the vehicle, which vehicle ultimately came to rest on the right shoulder of the road with a portion of the back end of the vehicle in the right travel lane. The Camaro could not immediately be straightened out due to icy conditions, at which point Patterson exited the vehicle to push and Stringer got in the driver's seat to steer. Lights and flashers were on the Camaro. Soon thereafter, a 2009 Freightliner tractor-trailer, operated by Defendant Johnie Stein, crashed into the Camaro, causing serious injuries to Stringer.

7. Johnie Stein was negligent, which was a proximate cause of injuries and damages sustained by the Keesha Stringer. Specific acts of negligence include, but are not limited to, the following:

- a. Failing to keep a proper lookout;
- b. Failing to keep the vehicle he was driving under proper control;
- c. Driving at a speed greater than was reasonable and prudent under the circumstances;
- d. Careless and prohibited driving;
- e. Otherwise failing to exercise ordinary and reasonable care and to obey the rules of the road applicable to operators of motor vehicles.

8. As a proximate result of the negligence of Johnie Stein, for which Defendant Smith Transportation Incorporated is vicariously liable, Plaintiff Keesha Stringer sustained the following injuries and damages:

- a. Permanent physical injury;
- b. Past and future pain, suffering and mental anguish;

- c. Past and future medical expenses;
- d. Past and future loss of earnings and loss of earning capacity;
- e. Scars and disfigurement.

9. At the time of the motor vehicle collision described herein, Johnie Stein was operating the aforementioned Freightliner truck within the course and scope of his employment with Smith Transportation Incorporated, which is vicariously liable for the negligent acts of Johnie Stein described herein under the doctrine of respondeat superior.

10. Plaintiff should be compensated for the nature, extent, duration and permanency of her injuries and damages described herein.

WHEREFORE, Plaintiff Keesha Stringer prays for judgment against Defendants, jointly and severally, in an amount adequate to compensate her for the damages she has sustained, which amount exceeds federal court jurisdictional limits in diversity of citizenship cases. Further, she prays for her costs, attorney's fees and for all other just and proper relief to which she is entitled.

Respectfully,

**THE BRAD HENDRICKS LAW FIRM**  
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